

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LORRI POE,	)	
	)	
Plaintiff,	)	No. 08 CV 2686
v.	)	
	)	Judge Guzman
HEALTHCARE REVENUE RECOVERY	)	Magistrate Judge Schenkier
GROUP, LLC,	)	
Defendant.	)	
	)	

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendant, HEALTHCARE REVENUE RECOVERY GROUP, LLC, by and through its undersigned counsel, David M. Schultz and Stephen D. Vernon, pursuant to Federal Rule of Civil Procedure 6(b)(2), respectfully requests that this Court grant it a 14 day enlargement of time to file its responsive pleading to Plaintiff's Complaint and in support thereof, states as follows:

1. Plaintiff's Complaint is 8 pages consisting of 50 paragraphs. It purports to state claims under the Fair Debt Collection Practices Act ("FDCPA") and a state law theory against Defendant.
2. Defendant's answer or otherwise responsive pleadings was due on June 2, 2008.
3. Defense counsel was only recently retained by Defendant on June 3, 2008. Defendant's failure to respond to Plaintiff's Complaint by June 2, 2008 was the result of excusable neglect as Defendant was waiting for his insurance company to assign it counsel.
4. Defendant is requesting this additional time to allow its counsel to complete and finalize its factual investigation into the allegations of Plaintiff's Complaint and to prepare the appropriate response to Plaintiff's Complaint.
5. Defendant hereby requests an additional 14 days from June 5, 2008 to answer or otherwise respond to Plaintiff's Complaint, up to and including June 19, 2008

6. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.

7. Defense counsel contacted Plaintiff's counsel regarding this motion and Plaintiff does not object to the present motion or the extension.

WHEREFORE, HEALTHCARE REVENUE RECOVERY GROUP, LLC, respectfully requests that this Court grant it a 14 day enlargement of time, to and including June 19, 2008, in which to answer or otherwise plead to Plaintiff's Complaint.

HEALTHCARE REVENUE RECOVERY  
GROUP, LLC

By: s/Stephen D. Vernon  
One of Its Attorneys

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